

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v.

Civil Action No. 3:17-01362

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

Civil Action No. 3:17-01665

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

NOTICE OF REMOTE DEPOSITION OF THOMAS MCGUIRE, PH.D.

Defendant Cardinal Health, Inc., by and through counsel, hereby gives notice that the remote, oral deposition of Thomas McGuire, Ph.D., will take place on September 9, 2020, beginning at 9:00 a.m. Eastern Time. The deposition shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

Defendants request production of the following in advance of the deposition: An itemization of the hours spent and expected to be spent, and compensation paid and expected to be paid, for the Deponent's work and for each member of the Deponent's support team's work in this matter, including all invoices submitted to counsel.

PLEASE TAKE FURTHER NOTICE that the Deponent must have access to a laptop, computer, or tablet with web camera capability. Deponent may not use a cell phone to provide testimony. Deponent must also have the capability to view documents electronically. To the extent Deponent is not in possession of the required technology, documents shall be provided to the Deponent in hard copy and/or Deponent's counsel shall provide the required technology.

Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponent must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponent) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: September 2, 2020

Respectfully submitted,

/s/ Steven R. Ruby

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Steven R. Ruby (WVSB No. 10752)

David R. Pogue (WVSB No. 10806)

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 2nd day of September, 2020, the foregoing “Notice of Remote Deposition of Thomas McGuire, Ph.D.” was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail to mdl2804discovery@motleyrice.com and track2opioiddefendants@reedsmith.com.

Dated: September 2, 2020

/s/ Steven R. Ruby
Steven R. Ruby (WVSB No. 10752)